

March 25, 2021

Nathan Ochsner, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA,

VS.

**ANGEL FUENTES,
Defendant.**

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CRIMINAL NO. 4:21cr152

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

“Machinegun” is defined in Title 26, United States Code, § 5845(b), as: any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

A “Swift Link” is an after-market manufactured and sold component part designed to be placed into an AR-15 style rifle which allows the rifle to be fired in a fully automatic mode.

COUNT ONE

Possession with Intent to Distribute Cocaine

Between the dates of January 25, 2021 and March 1, 2021, in the Houston Division of the Southern District of Texas,

ANGEL FUENTES,

defendant herein, did knowingly and intentionally possess with the intent to distribute a controlled substance. This violation involved five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii).

COUNT TWO

Aiding and Abetting and Using and Carrying a Firearm During and in Relation to a Drug Trafficking Crime

Between the dates of January 25, 2021 and March 1, 2021, in the Houston Division of the Southern District of Texas,

ANGEL FUENTES,

and others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm, during and in relationship to a drug trafficking crime for which they may be prosecuted in a court of the United States, Possession with Intent to Distribute a Controlled Substance.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(i) and 2.

COUNT THREE

Possession of a Machinegun

On or about January 25, 2021, in the Houston Division of the Southern District of Texas, the defendant,

ANGEL FUENTES,

did knowingly possess a machinegun, as defined in Title 26, United States Code, § 5845(b), namely, two (2) AR-15 Swift Locks.

In violation of Title 18, United States Code, §§ 922(o)(1) and 924(a)(2).

COUNT FOUR

Possession of a Firearm by a Convicted Felon

On or about March 1, 2021, in the Houston Division of the Southern District of Texas, the defendant,

ANGEL FUENTES,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit, a Springfield Armory model XD-9, 9mm, semi-automatic pistol, a Glock, model 27, .40 caliber, semi-automatic pistol, and a Zastava Arms model ZPAP92 semi-automatic rifle.

In violation of Title 18, United States Code, § 922(g)(1).

Notice of Criminal Forfeiture

Pursuant to Title 18, United States Code, §§ 924(d)(1), and Title 28, United States

Code, § 2461(c), the United States of America hereby gives notice that all firearms and ammunition involved in, or used in the commission of the offense in violation of Title 18, United States Code, § 922(g)(1) charged in Count Four are subject to forfeiture, including, but not limited to:

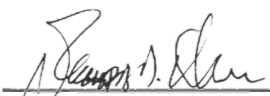
- A Springfield Armory model XD-9, 9mm semi-automatic pistol, serial number MG847804.
- A Glock, model 27, .40 caliber semi-automatic pistol, serial number BEUZ396.
- A Zastava Arms, model ZPAP92 rifle, serial number Z92-078692.
- Two AR-15 Swift Link auto-sears.

A TRUE BILL:

Original Signature on File

FOREMAN OF THE GRAND JURY

JENNIFER B. LOWERY
Acting United States Attorney

BY: 

RICHARD D. HANES
Assistant United States Attorney